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NORTH DAKOTA
DEPARTMENT of HEALTH

ENVIRONMENTAL HEALTH SECTION
Gold Seal Center, 918 E. Divide Ave.
Bismarck, ND 58501-1947
701.328.5200 (fax)
www.ndhealth.gov



March 30, 2006

MICHAEL J RYAN
RED RIVER VALLEY WATER SUPPLY PROJECT
BUREAU OF RECLAMATION
PO BOX 1017
BISMARCK ND 58502-1017

Dear Mr. Ryan:

This department has completed its initial review of the draft Environmental Impact Statement (EIS) on the Red River Valley Water Supply Project. Appendix C: Surface Water Quality is omitted from this document due to refinements in water quality modeling which was requested by this department. We will provide final comments after we have an opportunity to review this section.

The stated purpose of the project is to meet the municipal, rural, and industrial water supply needs in the Red River Valley as well as seeking opportunities to enhance the aquatic environment through maintaining and/or improving water quality and recreation.

The draft EIS examines seven alternatives for meeting the water needs of the Red River Valley. A case could be made for several alternatives, however, only one, the GDU import to the Sheyenne River provides a reliable source of high quality water for MR and I needs while also enhancing opportunities for improving aquatic ecosystem health and recreation.

The Sheyenne River ecosystem would have a potential to undergo significant positive changes if project water were delivered to Lake Ashtabula. We recommend a minimum instream flow for the Sheyenne River be established with these waters being additive to the MR and I needs. We believe the recommendation from the North Dakota Game and Fish Department establishes a defensible basis for instream flows on the Sheyenne River. We also recommend a mechanism be put in place to allow the flows to enter the Red River of the North and be dedicated to maintaining aquatic life and not be available for appropriations.

The Red River reach between the Fargo wastewater treatment outfall/Moorhead wastewater treatment outfall down to the confluence of the Sheyenne River will be effluent dominated during severe droughts. We request Reclamation explore ways to provide flow from the project water in the Sheyenne River to a location above the outfalls.

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Environmental Health
Section Chief's Office
701.328.5150

Division of
Air Quality
701.328.5188

Division of
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701.328.5211

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Waste Management
701.328.5166

Division of
Water Quality
701.328.5210

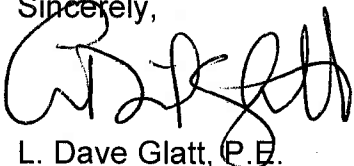
Michael J. Ryan
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The inter basin transfer of biota is a contentious and complicated issue. The introduction of undesirable organism from one basin to another requires a sequence of events that begins with introduction and culminates with the establishment of a viable population. The probability of biological transfer along all pathways must be realistically considered with the risk associated with levels of treatment. A defensible approach would be to treat the water to a level that reduces risk below the anthropogenic probability but not to a level of zero risk.

In January 2006, the Stage 2 Disinfectants/Disinfection Byproducts Rule (Stage 2) and the Long Term 2 Enhanced Surface Water Treatment Rule (LT2) were promulgated under the federal Safe Drinking Water Act (SDWA). These new rules will impact all communities and some industries in the project area and may lead to compliance problems beyond that presently being experienced under Stage 1 and LT1. Under Stage 2, compliance with drinking water standards for two classes of disinfection byproducts, total trihalomethanes and haloacetic acids, will be based on monitoring at each site versus averaging of multiple sites. Under LT2, surface water systems will be required to provide additional treatment based on source water microbial quality. Under both of these rules, source water quality becomes increasingly important to achieve and maintain SDWA compliance. This reinforces the need to explore options to provide project flow in the Sheyenne River upstream of the Fargo/Moorhead area. This also reinforces the need to more fully consider SDWA compliance potential/issues when comparing the various project options.

The draft EIS and all supporting documents addressing the SDWA should be updated to reflect promulgation of the Stage 2 and LT2 rules and their impact on the project. All discussion regarding the SDWA should refer to drinking water versus water quality standards to avoid confusion between CWA and SDWA standards. With regard to pH as a secondary drinking water standard, please note that it is both expected and acceptable that systems utilizing lime softening treatment will have a finished water pH in excess of 9.0.

Sincerely,



L. Dave Glatt, P.E.
Chief
Environmental Health Section

LDG/MTS:mjm